

Adriene Mixon (New York Bar No. 2773414)
Email: mixona@sec.gov
Attorney for Plaintiff
SECURITIES AND EXCHANGE COMMISSION
444 S. Flower Street, Suite 900
Los Angeles, California 90071
Telephone: (202) 551-4463
Facsimile: (202) 772-9363

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA
Northern Division

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

v.

DAVID B. KAPLAN, ESQ.,
SYNCHRONIZED ORGANIZATIONAL
SOLUTIONS, LLC,
SYNCHRONIZED ORGANIZATIONAL
SOLUTIONS INTERNATIONAL, LTD.,
and MANNA INTERNATIONAL
ENTERPRISES, INC.,

Defendants,

and

LISA M. KAPLAN,
THE WATER-WALKING
FOUNDATION, INC., and
MANNA INVESTMENTS, LLC,

Relief Defendants.

Case No. 3:16-cv-00270-MMD-VPC

Honorable Miranda M. Du

**ORDER GRANTING STIPULATION
TO EXTEND TIME TO FILE A
MOTION FOR AN ORDER TO
DISBURSE THE DISTRIBUTION FUND**

**SECOND REQUESTED EXTENSION OF
TIME TO FILE A MOTION FOR AN
ORDER TO DISBURSE**

1 IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned parties, as
2 follows:

3 1. On May 10, 2024, the Court ordered that Plaintiff United States Securities and
4 Exchange Commission (the “SEC” or “Commission”) shall file a Motion to Approve the
5 Distribution Plan (the “Distribution Plan”) by July 31, 2024, and a Motion for an Order to Disburse
6 the Distribution Fund (the “Motion”) by December 2, 2024. (ECF No. 175). The SEC filed the
7 Motion to Approve the Distribution Plan on July 31, 2024, and the Court approved the Distribution
8 Plan on August 30, 2024. (ECF No. 182).

9
10 2. On September 30, 2024, Plan Notice and Certification Forms were mailed to 23
11 Preliminary Claimants. *See Status Report of Rust Consulting, Inc.* (ECF No. 183). To be
12 considered eligible for a distribution payment from the Distribution Fund, a Preliminary Claimant
13 was required to complete and return the Certification Form, along with any supporting
14 documentation, by November 14, 2024. *Id.*

15
16 3. As of this date, 11 of the 23 Preliminary Claimants have returned the Certification
17 Form. Three Preliminary Claimants submitted disputes to the information provided by the
18 Distribution Agent on the Certification Forms. The Distribution Agent and the SEC have been
19 working to resolve the disputes. One of the Preliminary Claimants intends to submit supplemental
20 information next week to resolve their dispute. The resolution of the disputes may affect the
21 amount of the distribution payments to other Eligible Claimants.

22
23 4. On December 10, 2024, the Court granted the SEC’s first request to extend the
24 deadline for filing the Motion to December 13, 2024.

25 5. The SEC and counsel for Dean Properties, LLC have agreed to a second extension,
26 during which time the Distribution Agent and the SEC will continue to work to resolve the disputes
27 submitted by the Preliminary Claimants.
28

6. Accordingly, the Parties respectfully request that the time to file the Motion for an Order to Disburse be extended until December 20, 2024.

/s/ Adriene Mixon

Adriene Mixon (New York Bar
No, 2773414)
444 S. Flower Street, Suite 900
Los Angeles, CA 90071
Telephone (202) 551-4463
Facsimile: (202) 771-9363
Email: mixona@sec.gov

/s/ Matthew Pruitt

Matthew Pruitt, Esq.
301 N. 200 E., Suite 3-A
St. George, Uta 84770
Telephone: (435) 574-5672
Email: mpruitt@kmclaw.com

Counsel for Plaintiff United States
Securities and Exchange Commission

Counsel for Dean Properties, LLC.

IT IS SO ORDERED:



The Honorable Miranda M. Du
United States District Judge

DATED: December 13, 2024